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FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

MAY 17 2022

SEAN F. McAVOY, CLERK
DEPUTY
SPOKANE, WASHINGTON

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON

9 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

14 RAYMOND LENARD HOLT,

15 Defendant.

1:22-CR-2060-SAB

INDICTMENT

Vio: 18 U.S.C. §§ 1152, 2244(a)(5):
Abusive Sexual Contact With
a Child, In Indian Country

18 U.S.C. § 2253(a)(2) and
(a)(3)
Forfeiture Allegations

20 The Grand Jury charges:

21 On a date unknown, but between on or about March 5, 2013, and on or about
22 March 4, 2016, within the external boundaries of the Yakama Nation Indian
23 Reservation, in Indian Country, in the Eastern District of Washington, the
24 Defendant, RAYMOND LENARD HOLT, a non-Indian, did knowingly engage in
25 sexual contact and caused sexual contact with Minor 1, an Indian, to wit, the
26 intentional touching, directly or through the clothing, of the groin, genitalia or
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1 buttocks of Minor 1, a minor who had not attained the age of 12 years, and such
2 touching was done with an intent to abuse, humiliate, harass, degrade, arouse and
3 gratify the sexual desire of any person, in violation of 18 U.S.C. §§ 1152,
4 2244(a)(5).
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7 NOTICE OF CRIMINAL FORFEITURE ALLEGATIONS

8 The allegations contained in this Indictment are hereby realleged and
9 incorporated by reference for the purpose of alleging forfeitures.
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11 Pursuant to 18 U.S.C. § 2253, upon conviction of an offense(s) in violation
12 of 18 U.S.C. § 2244, as alleged in this Indictment, the Defendant, RAYMOND
13 LENARD HOLT, shall forfeit to the United States any property, real or personal,
14 constituting or traceable to gross profits or other proceeds obtained from such
15 offenses; and, any property, real or personal, used or intended to be used to commit
16 or to promote the commission of such offenses, or any property traceable to such
17 property.
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21 If any of the property described above, as a result of any act or omission of
22 the defendant:
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- 24 a. cannot be located upon the exercise of due diligence;
25 b. has been transferred or sold to, or deposited with, a third party;
26 c. has been placed beyond the jurisdiction of the court;
27 d. has been substantially diminished in value; or
28

1 e. has been commingled with other property which cannot be divided
2 without difficulty,
3 the United States of America shall be entitled to forfeiture of substitute property
4 pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 2253(b).
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6 DATED this 17th day of May 2022.
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